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Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC

MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-1173;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Best Buy Co., et al. v. Technicolor SA, et al., No. 13-cv-05264;

Target Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

**DECLARATION OF GERARD A. DEVER
 IN SUPPORT OF INDIRECT
 PURCHASER PLAINTIFFS'
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 *Sears, Roebuck and Co. and Kmart Corp. v.*)
2 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-)
3 05514;)
4)
5 *Sears, Roebuck and Co. and Kmart Corp. v.*)
6 *Technicolor SA*, No. 13-cv-05262;)
7)
8 *Viewsonic Corp. v. Chunghwa Picture Tubes,*)
9 *Ltd.* No. 14-cv-02510.)
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1 I, GERARD A. DEVER, declare as follows:

2 1. I am a member of the law firm of Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I submit this Declaration in support of IPPs'
5 Administrative Motion to File Documents Under Seal, related to IPP's Response to Defendants'
6 Joint Motion *In Limine* to Exclude Improper Characterizations of Or References to Defendants and
7 Alleged Co-Conspirators ("IPPs' Response to Defendants' MIL No. 6").

8 2. I am a member in good standing of the bar of the Commonwealth of Pennsylvania,
9 and I am admitted *pro hac vice* to practice before this Court.

10 3. Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court's
11 General Order No. 62, effective May 10, 2010, IPPs, by and through their counsel, respectfully
12 request an Order permitting filing under seal Exhibits A through C to the Declaration of Gerard A.
13 Dever in Support of IPPs' Response to Defendants' MIL No. 6 ("Dever Declaration").

14 4. Exhibit A to the Dever Declaration is a Hitachi email (HDP-CRT00048694E-695).

15 5. Exhibit B to the Dever Declaration is a Contact Report (CHU00028755.01-756.02).

16 6. Exhibit C to the Dever Declaration is a letter from Philips to Samsung (SDCRT-
17 0086690).

18 7. IPPs respectfully request that the documents identified herein be filed under seal.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21 Executed on February 27, 2015, in Philadelphia, Pennsylvania.

22 /s/ Gerard A. Dever

23 Gerard A. Dever

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